

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)	
)	No. 3:24-CR-00151
)	JUDGE RICHARDSON
v.)	
)	
MATTHEW ISSAC KNOOT)	

MOTION TO CONTINUE TRIAL AND RELATED DEADLINES

Through undersigned counsel, Matthew Knoot moves this Court to continue the trial in this matter, currently set for Tuesday, August 12, 2025, at 9:00 a.m. (D.E. 70). Counsel requests the Court continue the trial for up to thirty (30) days. Mr. Knoot also requests a continuance of all trial-related deadlines. In support of this motion, Mr. Knoot asserts the following:

1. The Court previously granted Mr. Knoot’s request for a continuance on May 22, 2025.
(D.E. 70)
2. Since that time, the undersigned has met with Mr. Knoot weekly to finalize a trial plan and prepare for trial.
3. As the defense team reviewed the discovery, the undersigned became aware that the defense did not have copies of the forensic imaging of the victim laptops. Counsel was concerned about this. In its notice of expert witnesses, the Government noted that it anticipated its witness, Andrew McDole would “[o]ffer expert testimony, in general terms and/or as applied in this case, *regarding the forensic imaging of data from computers, including the desktop computer seized from the defendant in this case . . .*”
(D.E. 61)

4. On June 26, 2025, undersigned emailed the Government to request copies of the forensic imaging of the victim laptops. After a week or so of email exchanges and telephone conversations with the Government, undersigned was informed that he could come to the FBI's field office and review the material. Undersigned has not yet had the time to review that material due to other work-related deadlines.
5. On June 25, 2025, the United States disclosed an additional batch of discovery to the defense.
6. Just last week, the Government disclosed another batch of discovery on July 16, 2025. This batch contained numerous files related to one of the alleged victim companies and nearly all the files are very relevant to the facts of the case. Undersigned has attempted to review all the documents, but because of the amount, undersigned has been unable to review all the discovery and thus, has been unable to review it fully with Mr. Knoot.
7. Counsel spoke with the Government on the date of this filing and discussed this motion. Counsel was made aware that more discovery disclosures will be made as soon as the Government receives it.
8. The Government also expressed its objection to this request.
9. Due to other work-related deadlines coupled with the recent discovery disclosure and the expected future disclosure, the defense team will be unable to properly prepare for the trial, which is currently less than four weeks away.
10. This motion is filed contemporaneously with Mr. Knoot's signed, speedy trial waiver.

Based on the foregoing, Mr. Knoot requests this Court grant his motion and continue the trial and all related deadlines for up to 30 days.

Respectfully submitted,

s/ David Fletcher

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2025, I electronically filed the foregoing *Motion to Continue Trial and All Related Deadlines* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Joshua Kurtzman, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, Tennessee, 37203.

s/ David Fletcher

DAVID FLETCHER